

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

In re:	)	Case No. 21-61491
	)	
Squirrels Research Labs LLC,	)	Chapter 11
	)	
Debtor.	)	Judge Kendig
	)	
Squirrels Research Labs LLC,	)	
	)	
Plaintiff,	)	Adv. Pro. No. 22-6003
vs.	)	
	)	
Fleur-de-Lis Development, LLC, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF APPEARANCE AND REQUEST FOR NOTICE**

PLEASE TAKE NOTICE that Matthew T. Schaeffer of Bailey Cavalieri LLC enters his appearance as counsel for Defendant Cynthia Heinz and Defendant Rocco Piacentino in the above-captioned case pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure. The undersigned counsel respectfully requests that he be served with all papers served or required to be served in this case, including all applications, motions, petitions, plans, pleadings, requests, complaints, orders, proposed orders, or other papers, to be served at the address set forth below:

Matthew T. Schaeffer  
Bailey Cavalieri LLC  
10 West Broad Street, Suite 2100  
Columbus, Ohio 43215  
Phone: 614-229-3289 / Fax: 614-221-0479  
E-Mail: [mschaeffer@baileycav.com](mailto:mschaeffer@baileycav.com)

Respectfully submitted,

/s/ Matthew T. Schaeffer

Matthew T. Schaeffer (0066750)

Bailey Cavalieri LLC

10 West Broad Street, Suite 2100

Columbus, Ohio 43215

Phone: 614-229-3289 / Fax: 614-221-0479

E-Mail: [mschaeffer@baileycav.com](mailto:mschaeffer@baileycav.com)

Counsel for Defendant Cynthia Heinz and  
Defendant Rocco Piacentino

### **CERTIFICATE OF SERVICE**

I certify that on March 11, 2022, a true and correct copy of the *Notice of Appearance and Request for Notice* was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Marc Merklin, on behalf of Debtor, at [mmerklin@brouse.com](mailto:mmerklin@brouse.com), [tpalcic@brouse.com](mailto:tpalcic@brouse.com); and [mmiller@brouse.com](mailto:mmiller@brouse.com);
- Matthew T. Schaeffer, on behalf of Defendants, at [mschaeffer@baileycav.com](mailto:mschaeffer@baileycav.com) and [lpatterson@baileycav.com](mailto:lpatterson@baileycav.com);
- United States Trustee - (Registered address)@usdoj.gov;
- Julie K. Zurn, on behalf of Debtor, at [jzurn@brouse.com](mailto:jzurn@brouse.com), and [tpalcic@brouse.com](mailto:tpalcic@brouse.com);

And by regular U.S. Mail, postage prepaid, upon:

Cynthia Heinz  
3009 Aurora Drive  
Plano, TX 75093

Rocco Piacentino  
2626 S. Whetstone River Road  
Marion, OH 43302

Respectfully submitted,

/s/ Matthew T. Schaeffer

Matthew T. Schaeffer (0066750)

Bailey Cavalieri LLC

10 West Broad Street, Suite 2100

Columbus, Ohio 43215

Phone: 614-229-3289 / Fax: 614-221-0479

E-Mail: [mschaeffer@baileycav.com](mailto:mschaeffer@baileycav.com)

Counsel for Defendant Cynthia Heinz and  
Defendant Rocco Piacentino